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SAFETY PROFESSIONALS

December 6, 2021

The U.S. Department of Labor  
U.S. Occupational Safety and Health Administration  
200 Constitution Ave NW  
Washington, DC 20210

## **U.S. Occupational Safety and Health Administration COVID-19 Vaccination and Testing: Emergency Temporary Standard Document ID: OSHA-2021-0007-0001 Federal Register Number 2021-23643**

The American Society of Safety Professionals (ASSP) is pleased to submit these comments. They are in response to the U.S. Department of Labor notification of an Emergency Temporary Standard (ETS) addressing COVID-19.

### **Introduction**

As the DOL, including OSHA, is aware, ASSP is the oldest society of safety professionals in the world. Founded in 1911, we represent more than 36,000 professionals advancing workplace safety and health in every industry, in every state and around the globe. ASSP members have set the occupational safety and health (OSH) community's standards for excellence, ethics and practice for more than 100 years.

### **ASSP's Overall Position**

The Society published a position statement addressing OSHA's COVID-19 ETS on Oct. 8 (Attachment #1). A significant number of members shared insights and suggestions with ASSP. Due to the short timeframe from announcement of the ETS to implementation, we refer to that position and focus here on providing technical comments on the ETS as published in the *Federal Register*.

The summary position points are listed below.

To address the anticipated ETS, ASSP takes the following position:

- During the past 18 months, ASSP has supported public and private sector initiatives intended to stop the spread of this deadly disease.
- ASSP has provided and produced significant COVID-19 content, all of which is available on a complimentary basis to all stakeholders.
- We support public policy initiatives backed by good science and sound technology.
- ASSP recommends that instead of implementing an ETS based primarily on an employee count, OSHA consider an approach based on risk assessment.
- ASSP recommends that OSHA review the exemption of employers with less than 100 employees. The size of a company or organization does not affect how the disease affects workers.
- In addition, our members believe that regardless of workforce size, employers can implement controls to prevent the spread of COVID-19 in the workplace, including contractors that have fewer than 100 employees and operate on multiemployer worksites.



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ASSP notes that over the past 18 months, OSH professionals have helped minimize workplace exposures to COVID-19 by evaluating their employers' risks and implementing various protocols. ASSP believes these risk-based approaches have kept employers open for business and supported the economy.

## Response to OSHA Information Requests

ASSP reviewed the questions published in the *Federal Register* and is commenting on questions about which our members have specific and applicable experience and expertise. Many ASSP members work for organizations that implement the programs and initiatives cited in the call for comments addressing the ETS. We have notified our 36,000+ members of this issue and asked them to share input.

ASSP uses the terms "epidemic" and "pandemic" within this comment by intent. ASSP understands that OSHA cannot write pandemic standards since it is not a global agency. For the purposes of the ETS, ASSP uses the term "epidemic." In other portions of this statement, we use the term "pandemic" since ASSP has also addressed COVID-19 on a global level through its standards-development activities.

### **OSHA Issue #1: Employers with fewer than 100 employees.**

**ASSP:** This is perhaps the most significant concern raised by ASSP members regardless of their stance on the overall issue of workplace vaccinations and testing. As noted in our position statement:

- ASSP recommends that instead of implementing an ETS based primarily on an employee count, OSHA consider an approach based on risk assessment.
- ASSP recommends that OSHA review the exemption of employers with less than 100 employees. The size of a company or organization does not affect how the disease affects workers.

We believe that OSH risk assessment methodologies move actions beyond the limitations created by setting a specific number such as 100 employees. This recent inquiry from a member who works as an independent OSH consultant highlights this concern.

*I would welcome ASSP's insight and support on an issue that I am currently addressing. As part of my consultation business, I have historically always noted to my clients that compliance with OSHA is required, but it is the starting point and first rung for effective safety and health programs. However, it is a good place to start the conversation for OSH performance.*

*I am somewhat in a quandary now on the proposed COVID-19 ETS and its application. I have two clients and both have similar industrial operations and are involved in manufacturing. One of the companies has 94 employees and the other has 106 employees. They are not the same companies, but I argue that their hazards and exposures are virtually the same and they are even in the same geographic area. My concern is that the hazards of COVID exposure is the same for both of these companies and I do not understand how an artificial number of 100 employees is backed by the science I have seen releases by the Centers for Disease Control. Under the law one company is required to take action and the other is not, even though the number of impacted employees in my view is irrelevant when looking at how this disease is spread.*

*How can I look the one client in the face and advise them to implement COVID-19 controls if the federal government in effect has told them that they do not need to because they have less than 100 employees? From the OSH risk assessment perspective, I am not following this methodology.*





ASSP recommends that OSHA review the risk assessment model created by Georgi Popov, CSP, SMS, ARM, CMC, QEP, from Overland Park, Kansas, and Bruce Lyon, CSP, P.E., SMS, ARM, CHMM, of Kansas City: *COVID-19: The Role of the Risk Management Process and Its Impact on Pandemics*. This model aligns with ISO 31000 and we believe organizations can use it to effectively addressing COVID-19 hazards and exposures. This model will be submitted as an Excel file in addition to this comment.

**OSHA Issue #2: Significant risk from exposure to COVID-19.**

**ASSP:** OSHA has standards and guidance on disease control. As an alternative, we suggest that OSHA propose a rule addressing epidemics overall or consider revising an existing standard to provide more regulatory structure related to epidemic response. We believe an epidemic standard would be better than a standard specific to COVID-19.

From our review, the ETS appears to implement vaccination as the only control. Many members have commented that OSHA needs to better consider the hierarchy of controls and how the hierarchy can also be used to address COVID-19 hazards and exposures. The ETS provides poor recognition of industrial ventilation, physical distancing, worksite barriers and other potential controls. We believe a risk assessment would assist any organization, regardless of its size, when evaluating employee exposure to COVID-19.

Members have also commented that an ETS is limited to a six-month application period. We have received feedback from some members that a “grave danger” deserves a full and complete “permanent” standard with all the supporting language. Based on the science we have seen at the time of this comment, the danger of COVID-19 could be expected to last longer than six months. We think a universal epidemic standard could have value when considered from the context of when SARS appeared, bird flu, H1N1, etc.

Reliable data sources indicate that more than 725,000+ people have died in the U.S. due to COVID-19, and millions more have been infected. ASSP, and its membership, have great concern for this loss and the impact of COVID-19 both in the U.S. and globally. What is less clear, however, is how many of these cases are related to exposure in the workplace. Data specific to workplace exposure to COVID-19 would help organizations more effectively address this public health hazard.

The issue raised by many members is to equate this overall data point with the working population. Our understanding is that the data collection systems used for this information have not been consistently applied throughout the U.S. CDC has noted that many of those who have died were individuals with comorbidities and that roughly 75% of those deaths involved persons age 65 years old and older. For the purposes of effective workplace risk assessment, it would be beneficial to have a way to capture and present data related to workplace exposures. ASSP members know most cases are community originated, but the hybrid nature of this issue doesn't lend itself well to separating workplace and community. Thus, what applies to one venue applies to the other.

The ISO TC283 Committee, for which ASSP serves as administrator of the U.S. Technical Advisory Group, is developing a pandemic standard (*ISO 45006*) that it plans to propose as an American National Standard or as an ANSI-registered technical report.

*Occupational Health and Safety Management — Preventing and Managing Infectious Diseases – General Guidelines for Organization*

*Scope: This document gives guidelines for organizations on how to prevent exposure to, and manage the risks associated with, infectious diseases that:*





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- *present a risk of severe ill health or death and can impact the health, safety and well-being of workers and relevant interested parties;*
- *present a lower risk to health yet have a significant impact on the organization, its workers and relevant interested parties.*

*This document is applicable to organizations of all sizes and sectors.*

*Note: Applicable legislation and guidance is provided by government, regulators and health authorities for specific infection controls for the protection of workers in clinical settings and other healthcare settings and for work activities on or with pathogenic microorganisms.*

We also ask that OSHA address an identified inconsistency in its public policy. Specifically, [OSHA's Bloodborne Pathogens](#) standard permits workers to decline Hepatitis B vaccinations after exposure. It is well established that chronic Hepatitis B infection can lead to serious illnesses such as cirrhosis and liver cancer, which are grave outcomes. However, employees can simply sign a [vaccine declination form](#) after exposure to this pathogen. The current ETS does not include similar provisions.

Over the past 18 months, our members have indicated that OSHA has struggled to align its efforts with state and local requirements, as well as with CDC and the public health sector. Our members also suggest the ETS should better recognize and encompass the role of state and local public health entities.

Since data indicate the source of most cases is the public health community sector and knowing that epidemics are a hybrid worker-public health issue, it makes sense to have state and local public health departments intimately involved in the issuance of epidemic guidance.

The ETS should emphasize the role of state and local public health departments (as the lead entities to issue guidance) to address epidemics and recognize their staff expertise (infectious disease specialists, epidemiologists) to address these infectious diseases.

### ***OSHA Issue #3: Prior COVID-19 infections.***

ASSP members have noted their interest in this issue and look forward to any additional science that OSHA or other federal agencies can provide. We also believe that our answers to OSHA Issues #2 and #4 have some application to this question.

### ***OSHA Issue #4: Experience with COVID-19 vaccination policies.***

**ASSP:** We will provide two examples.

#### **Example 1: ASSP Building and Event Requirements**

*Effective Nov. 15:*

- All team members entering the building must provide proof of full vaccination.
- If not vaccinated, all team members must provide proof of a negative test 24 hours before entering the building or attending an ASSP staff-related event. This does not include ASSP events such as PDC, SafetyFOCUS, or training courses.
- Face coverings must be worn outside of a staff member's specific office or cubicle.



- ASSP will continue to follow CDC guidelines and follow any federal, state and/or local standards and guidelines for the control of COVID-19.

*All ASSP-sponsored events will require:*

- Proof of full vaccination required for all attendees, exhibitors, contractors or staff to an ASSP event, such as PDC, SafetyFOCUS, or in-person courses and meetings.
- Face coverings will be required, except for an instructor or speaker. An instructor or speaker will remain at the front of the room to maintain physical distance from attendees.
- ASSP will continue to follow CDC guidelines as well as any federal, state and/or local standards and guidelines for the control of COVID-19.

### **Example 2: Safety 2022 Requirements**

During our Safety 2021 Professional Development Conference, Sept. 13-15 in Austin, TX, ASSP implemented and followed a detailed policy, which is included as Attachment #2.

These are the key points from that summary:

- Attendees must provide proof of full vaccination, or a negative COVID-19 test within 48 hours prior to badge pick up.
- Attendees must wear a face covering when in the convention center, except when drinking or eating. Face coverings shall cover the nose, mouth and chin. Avoid bandanas, gaiters, masks with exhalation valves or clear shield-like face masks.
- Attendees will be asked to follow good hygiene practices, including washing hands frequently, using hand sanitizer and maintaining physical distancing when possible.

Our event was a success both professionally and from the perspective of safety and health, as documented in an article published by the City of Austin Convention Bureau (Attachment #3).

### **OSHA Issue #5: COVID-19 testing and removal from workplace.**

**ASSP:** We would refer OSHA back to our answers for Issue #4. We do note:

- We have implemented a testing and removal policy for ASSP staff.
- ASSP has a testing and removal policy for attendees at our in-person education events.
- Our answers to OSHA Issue #4 address testing.
- ASSP has referred its staff to accessible testing facilities, and we have had no issues or concerns.
- We have had no instances of falsified testing results.

### **OSHA Issue #6: Face coverings.**

**ASSP:** During the ASSP 2021 Professional Development Conference, the Society purchased approximately 10,000 face coverings for distribution during Safety 2021 in Austin, and staff had access to these materials. We also have let employees know they may wear a face covering of their choice (e.g., bearing a sports team logo) provided it conforms to existing guidance and information. We have had no instances of staff members intentionally wearing a face covering that does not meet appropriate guidelines.

With respect to personal protective equipment, OSHA is aware through [NIOSH studies](#), the face coverings used by most workers in many workplaces do not meet the necessary filtering criteria to prevent COVID-19 aerosol droplet exposure. We have heard from many ASSP members that compounding this concern is the fact that many workers are wearing masks incorrectly regardless of their filtering effectiveness. One of the challenges OSHA will







need to face with the ETS and employers is the reality that relying on face covers may not completely serve as an adequate control measure.

**OSHA Issue #7: Other controls.**

**ASSP:** We have not experienced any COVID-19 exposures related to employees being exposed in the workplace. Every potential reported exposure we have had to address since March 2020 resulted from a staff member being exposed outside of the workplace.

ASSP and its members recognize COVID-19 as a public health crisis that must be addressed across a continuum and not viewed as an issue to be solely addressed in the workplace.

**OSHA Issue #8: Educational materials.**

**ASSP:** We are also aware from the thousands of inquiries we have received from our members and stakeholders that the results and consequences can range from very mild to very serious, depending on intensity of the disease. OSH professionals have requested more technical insight and support in ways to address COVID-19 hazards and exposures in the workplace.

ASSP has taken the following steps to help our members address COVID-19 and pandemics:

- During the past 18 months, ASSP has supported public and private sector initiatives intended to stop the spread of this deadly disease
- ASSP has provided significant [COVID-19 content](#), all of which is available on a complimentary basis to all stakeholders
- The Society has produced and released over 30 webinars and podcasts addressing COVID-19 from the perspective of assisting OSH professionals. These resources, along with our COVID page, have generated over 800,000 views.

It also needs to be noted that ASSP has tied its efforts with both pandemics and COVID-19 to the importance of implementing and managing pandemic approaches as part of an occupational health and safety management system. The Society created and offered a course for OSH professionals about how to prepare the workplace for a return to operations. Several thousand ASSP members have registered for this course and all feedback has been positive. This is important to note since ASSP is the only OSH organization that has provided this type of training.

**[Pandemic Challenges: How to Return to Work Safely](#)**

*Occupational safety and health professionals (OSH) play a key role in bringing employees and contractors back into the workplace following a pandemic like COVID-19. Gain information and review examples of practices OSH professionals can use to help their organization resume operations and safely return people to a traditional work environment. Use practical examples of how to conduct a hazard assessment to create a plan your workplace can use to effectively identify and mitigate hazards.*

Examples include:

**[COVID-19: ANSI/ASSP Z10 and Worker Engagement](#)**

In this webinar, recorded July 30, 2020, expert Greg Zigulis shares insights on how an OSH management system can help your organization keep workers safe and engaged during the COVID-19 pandemic.





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### [COVID-19 and Occupational Health and Safety Management Systems](#)

In a webinar recorded March 31, 2020, Vic Toy, M.P.H., CSP, CIH, FAIHA, chair of the U.S. technical advisory group on ISO 45001, explains how an organization can use the plan/do/check/act elements of its occupational safety and health management systems to guide its response to COVID-19.

### [How to Select the Best Safety Management System](#)

Occupational safety and health (OSH) professionals often ask, "Which safety management system standard should I use?" In many cases, it's a choice between [ANSI/ASSP Z10](#) or [ANSI/ASSP/ISO 45001](#).

### ***OSHA Issue #9: Feasibility and health impacts.***

ASSP: At our annual conference held Sept. 13-15, 2021, we had the following attendance:

- 2,500 virtual attendees who were not at the conference and are not included in these impact estimates
- 2,513 paid on-site attendees who were required to follow our protocols
- 2,000 exhibitors and contractors who were required to follow our protocols
- 100 staff and temporaries who were required to follow our protocols

We estimate the following:

- Three employees for three days checking all vaccination cards and/or testing results for attendees: 75 hours at an average hourly cost of \$125 (salaries and benefits): \$9,375
- Preparation time to prepare for the event: 100 hours - \$12,500
- Communication and outreach: 100 hours - \$12,500
- Testing kits and materials: \$50,000
- Miscellaneous: \$5,000

Total Estimated Expense: \$89,375 (ASSP COVID-19 protocols to hold a safe and healthful show over three days in Austin).

ASSP understands this addresses a voluntary event, our conference, and is not a direct comparison to the workplace. However, we believe the experience provides some insight. ASSP can attest that checking these records for large numbers of people can be a formidable task regardless of the setting.

Thank you for your time and attention to our comments. If we can be of any assistance in this matter, please feel free to contact ASSP via the information provided below.

Respectfully Submitted,

Bradley D. Giles, P.E., CSP, STS, FASSP  
President, ASSP

Copy To:       ASSP Board of Directors  
                  ASSP Council on Professional Affairs  
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## Attachment #1

### ASSP Position: OSHA Emergency Temporary Standard for COVID-19

*The American Society of Safety Professionals (ASSP) strives to elevate the safety profession and the individuals who choose it. We set the occupational safety and health community's standards for excellence and ethics. ASSP strives to uphold and elevate the value of the safety profession through innovation and thought leadership, and supports the development and dissemination of objective, data-driven, solutions-based safety and health practices.*

*On Sept. 9, 2021, the Biden Administration announced the U.S. Occupational Safety and Health Administration (OSHA) will develop an emergency temporary standard (ETS) related to COVID-19:*

- *Requiring All Employers with 100+ Employees to Ensure Their Workers are Vaccinated or Tested Weekly: The Department of Labor's Occupational Safety and Health Administration (OSHA) is developing a rule that will require all employers with 100 or more employees to ensure their workforce is fully vaccinated or require any workers who remain unvaccinated to produce a negative test result on at least a weekly basis before coming to work. OSHA will issue an Emergency Temporary Standard (ETS) to implement this requirement. This requirement will impact over 80 million workers in private sector businesses with 100+ employees.*

*ASSP has published a technical report, [ASSP/ISO TR - 45005-2021, Occupational Health and Safety Management – Safe Working During the COVID-19 Pandemic – General Guidelines for Organizations](#), registered with American National Standards Institute (ANSI) addressing COVID-19. It is available on a complimentary basis:*

- *This ANSI registered technical report gives guidelines for organizations on how to manage the risks arising from COVID-19 to protect work-related health, safety and well-being. This document is applicable to organizations of all sizes and sectors.*

*To address the anticipated ETS, ASSP takes the following position:*

- *During the past 18 months, ASSP has supported public and private sector initiatives intended to stop the spread of this deadly disease.*
- *ASSP has provided produced significant [COVID-19 content](#), all of which is available on a complimentary basis to all stakeholders.*
- *We support public policy initiatives backed by good science and sound technology.*
- *ASSP recommends that instead of implementing an ETS based primarily on an employee count, OSHA consider an approach based on risk assessment.*
- *ASSP recommends that OSHA review the exemption of employers with less than 100 employees. The size of a company or organization does not affect how the disease affects workers.*





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- *In addition, our members believe that regardless of workforce size, employers can implement controls to prevent the spread of COVID-19 in the workplace, including contractors that have fewer than 100 employees and operate on multiemployer worksites.*
- *ASSP will provide technical comments on the ETS when it is released to address any issues it believes warrants additional review.*

*Following release of the ETS, ASSP will notify and provide resources to its members and stakeholders on the topic.*

*Approved October 8, 2021*





## **Attachment #2**

### **ASSP COVID-19 OSH Protocols – 2021** **Professional Development Conference in Austin, Texas.**

#### **What safety and health protocols will be in place to protect people who attend in person?**

The Safety 2021 safety plan includes a range of protective measures designed to safeguard the health and safety of all conference attendees, exhibitors and ASSP staff. All individuals who attend the in-person conference in Austin will be required to follow established safety and health protocols. For the full in-person attendance guide, please visit our [Onsite Safety Plan](#) page.

To ensure a safe event for all, our current safety plan includes the following:

#### **What We Expect of Attendees**

- Attendees must provide proof of full vaccination, or a negative COVID-19 test within 48 hours prior to badge pick up. You will need to provide this information in order to pick up your badge.
- Attendees must wear a face covering when in the convention center, except when drinking and eating. Face coverings shall cover the nose, mouth and chin. Avoid bandanas, gaiters, masks with exhalation valves or clear shield-like face masks.
- Attendees will be asked to follow good hygiene practices, including washing hands frequently, using hand sanitizer and maintaining physical distancing when possible.

#### **What ASSP Will Do**

- ASSP will provide contactless badge printout.
- ASSP will arrange for spaced-seating sections at all sessions.
- ASSP will work with convention center staff to ensure that regular cleaning protocols are followed throughout the event.
- The ASSP safety team will continue to evaluate these and additional protocols, as well as CDC recommendations, to mitigate risk of infection during the in-person event so you can have a safe, enjoyable conference experience.
- ASSP will continue to provide any additional updates on the Safety 2021 website.

It is also important to note that based on our analysis of how we can best provide a safe, healthy environment for attendees, we will not provide traditional conference lunches as part of the event. We are confident there will be plenty of safe food options available to attendees. The Austin Convention Center is conveniently located near a wide range of restaurants and a variety of food trucks will be available so you will have plenty of safe food options while attending the conference. We are also adjusting the schedule to make sure you have adequate time for lunch each day.

In addition, we won't be holding board, council or committee meetings, nor will we be hosting lounges, receptions, dinners or retreats.

Please note that attending an in-person event presents an inherent risk of exposure to communicable disease. By attending this event, you voluntarily accept all risks related to exposure from communicable disease and agree to





not hold ASSP or its representatives liable for any illness or injury. You agree to follow all safety protocols issued by ASSP.

### **Is There a Maximum Number of People Allowed to Attend a Session?**

Yes. Each meeting room in the convention center and at the hotel has capacity limits, and seating is based on a first come, first-seated basis.

### **Why Shift the Date and Location?**

The safety and health of all involved remain our highest priority. We know that many members are eager to meet face-to-face with their ASSP colleagues, learn new things and see the latest safety innovations in person. Based on what we currently know about the pandemic, vaccine administration and projections about travel safety, we believe a hybrid event delivered in September offers ASSP the best opportunity to deliver our conference in a way that is mindful of the public safety and health challenges we continue to face due to the pandemic.

In addition, by offering a concurrent online program, we can provide a valuable learning experience for those not yet ready or able to travel, while enhancing the learning opportunities for those able to attend the live event.

### **What Factors Did ASSP Consider?**

Throughout the COVID-19 pandemic, we have continuously monitored and assessed various factors with respect to delivering in-person education. These include:

- rules and guidance at the federal, state, local and facility levels
- evolving public health and safety protocols and vaccination projections;
- the safety and health of our members, speakers, exhibitors, volunteers and staff
- financial models;
- business trends, including travel forecasts for 2021.

These factors remain fluid, and we will continue to monitor them in the coming months to ensure we can deliver a safe, informative, inspiring and fun event that also makes good business sense for ASSP.





Attachment #3: ASSP Austin Conference Article

## How the ASSP and Austin Partnered for a Safe Event

Author: Curt Wagner



On-site safeguards at the Austin Convention Center for the ASSP's Safety 2021 Professional Development Conference and Exposition included mandatory face coverings, among other protocol. (Robb Cohen Photography)

When the American Society of Safety Professionals (ASSP) first booked the Austin Convention Center as the site of its Safety 2021 Professional Development Conference and Exposition, COVID-19 vaccinations weren't widely available and, as planning continued, the Delta variant led to increased cases leading up to the Sept. 13-15 event. Meeting in person is important to ASSP's safety and health professional members from across the country. The interactive and collaborative conference offers attendees the ability to earn continuing education units, network with others, and discover products and services.







Lauren Bauerschmidt

“We knew there was a need for the event,” said Lauren Bauerschmidt, CSP, STS, standards development manager for ASSP. “Our annual conference helps safety professionals to keep their workers safe, and obviously that continued through the pandemic.”

From the outset of planning, ASSP wanted to implement a high level of safety protocols for the event. While the ASSP team was constantly monitoring vaccination rates, case rates, as well as local, state, and national regulations, they found a willing partner in Visit Austin to help with planning.

“Even though Safety 2021 was our 60th annual conference, it was ASSP’s first conference and expo in Austin,” Bauerschmidt said. “Working with a group that knows Austin in-depth simplified aspects of our planning.” In the Q&A below, Bauerschmidt talks about how ASSP and its Austin partners worked together to make its 2,402 in-person participants at its hybrid event — out of a total of 4,993 registered attendees — feel safe in Austin.

#### **Why did your organization choose Austin for the live event?**

One reason we chose to have our event in Austin is because we could have the convention center to ourselves, allowing us more control over the safety protocols and the ability to know everybody who was there, so to speak.

#### **How did Visit Austin and the convention center ease your planning load?**

It was really a partnership, and they were great partners. If we expressed a need or had a question, we found solutions together since they know their space, they know their city. And the recommendations and advice provided by Visit Austin saved us time and helped us provide attendees with a broader experience.

One example within the convention center that’s COVID-related was seating arrangements. We knew some people might be comfortable sitting close together, and some people might be less comfortable with that and want a little bit more space. So for the general session and for the concurrent sessions the left side of the room was set up with normal seating, and on the right side of the room attendees were seated in every other chair. We worked on that solution with the convention center staff to keep people safe in this new environment.







#### **Safety 2021 by the Numbers**

4,993 total registrations

2,402 in-person registrations

2,591 digital registrations

2,513 first-time attendees (total)

94 percent of responses to post-event survey said they would recommend the conference.

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Safety 2021 included and expo with **371** vendor booths.

#### **What were the biggest factors in producing a safe, successful event in the Austin Convention Center?**

Developing, communicating, and implementing comprehensive safety and health protocols were the driving factors that made Safety 2021 a success. We required all attendees to provide proof of full vaccination or a negative COVID-19 test within 48 hours of badge pick-up. On-site safeguards included mandatory face coverings, contactless registration, physical distancing, designated entrances and exits, seating limits in meeting rooms, and frequent cleaning of common areas. Food trucks enabled attendees to eat just outside the convention center. Many safety professionals voiced their appreciation of our strong commitment to keeping them safe during a challenging time for public health.

#### **How did you work with the Austin hotels and other venues on the attendee experience?**

I'm sure you've been to a conference where there's a huge line at registration to pick up your badge. We wanted to avoid that, especially since we were asking for additional information with the vaccination or test records. So we encouraged people to pick up their badges early, not only at the convention center, but at two of the hotels that had our badge pick-up kiosks in their lobbies. The hotels were very cooperative in helping to facilitate that. Also, we had some concurrent sessions in the hotel that's attached to the convention center and we had similar physically distanced seating options and those kinds of things at the hotel. So they were great.





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### **Did you have a code of conduct or set of expectations communicated in advance among staff and attendees?**

Yes. ASSP has had a code of conduct for a long time. We definitely had guidelines ahead of time. Kind of what we're talking about: Before you leave for the conference, make sure you have your vaccination card, negative test result, face masks, a whole lot of patience — things for everybody. And everybody complied. The lines were never too long because we allowed a lot of time for people to pick up their badges. That allowed people again to have that space and people understood these are the requirements.

### **Is that kind of communication well in advance one of the keys to pulling off a safe event?**

Absolutely. We are really big on setting expectations. Our attendees and exhibitors knew our expectation was to show proof of vaccination or negative tests, so they were prepared.

### **What were some other ways you created a safe experience for attendees?**

Safety people like to talk about layers of mitigation. If you think of a piece of Swiss cheese with its holes, you want to make sure the holes don't line up. So, for example, besides the measures already noted, we verified with the convention center that they had the highest level of filtration in their HVAC systems. There were many ways we were keeping people safe, but I would say the vaccination requirement, tests, face coverings, and meals outside were the main ways we did that.



Visit Austin and the Austin Convention Center provided ASSP organizers with recommendations and advice that saved time and improved the experience for attendees. (Courtesy Visit Austin)

### **With the food-truck meals, did you give attendees plenty of time to go back to their rooms to eat if that's what they decided?**

This was another way the Austin Convention Center helped us. There was a ballroom in the Expo Center that we weren't using, so they set up scores of well-spaced chairs and tables for people to sit. Obviously it's hot in Texas in September. If people didn't want to sit outside, there were places to sit inside physically distanced, but I think people just enjoyed being outside and having that fresh air, taking that little break and then coming back in. And our schedule was designed to give people enough time to do that. Sometimes with conventions you feel like you have to keep running to the next thing, so we built in extra time into the schedule so people wouldn't feel rushed.





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**How has the reaction been from attendees to all the safety measures and the code of conduct that you put in place?**

Overall, it was really positive. People felt safe and appreciated all the measures we put in place. Our event team received many positive comments during the three-day experience, confirming that we made the right decision in moving forward with the in-person component of the event.

**This was a hybrid event. How did Austin help with the hybrid experience?**

We didn't partner with them too much on the virtual side, but I will say that any space we needed, we had great access to it. So let's say I am actually in Austin and I am speaking in one of the virtual sessions — the convention center provided a speaker prep room, if you will, where virtual speakers could be in that live chat. The convention center was great with anything we needed.

